

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

SERVICIOS FUNERARIOS GG, S.A. DE C.V.,

Case No. 23-cv-10684

Plaintiff/Counter-Defendant,

v.

ADVENT INTERNATIONAL CORPORATION,

Defendant/Counter-Plaintiff.

**DECLARATION OF CARLOS M. SIRES IN SUPPORT OF MOTION TO COMPEL
ADVENT INTERNATIONAL CORPORATION TO (1) PRODUCE DOCUMENTS AND
(2) RESPOND TO INTERROGATORIES**

I, Carlos M. Sires, a Partner of the law firm of Boies Schiller Flexner, LLP that represents Plaintiff and Counterclaim-Defendant Servicios Funerarios GG, S.A. DE C.V. (“Servicios Funerarios”) in this matter, respectfully submit this Declaration and hereby state as follows:

1. Exhibit A annexed hereto is AIC’s Rule 26 Initial Disclosures.
2. Exhibit B annexed hereto is AIC’s Proposed Search Protocol.
3. Exhibit C annexed hereto is Servicios Funerarios’ Proposed Search Protocol.
4. Exhibit D annexed hereto is Excerpt from June 7, 2023 email from C. Sires to G. Soledad.
5. Exhibit E annexed hereto is the September 11, 2023 correspondence from C. Sires to G. Soledad.
6. Exhibit F annexed hereto is the Excerpt from September 21, 2023 email from C. Sires to G. Soledad, at 3.
7. Exhibit G annexed hereto is the Excerpt from September 22, 2023 email from V. Ramos to C. Sires, at 3.

8. Exhibit H annexed hereto is the Excerpt from email from A. Varela to V. Ramos, at 4.

9. Exhibit I annexed hereto is the Excerpt of September 29, 2023 email from V. Ramos to C. Sires, at 3.

10. Exhibit J annexed hereto is the Excerpt of Sept. 9, 2023 email from Joseph Margolies to C. Sires, at 2-3.

11. Exhibit K annexed hereto is the Excerpt of Sept. 13, 2023 email from A. Varela to G. Soledad, at 1-2.

12. Exhibit L annexed hereto is the List of Narrowed Search Terms for Disputed Period.

13. Exhibit M annexed hereto is the Excerpt of Oct. 16, 2023 Letter from C. Sires to G. Soledad, at 1.

14. Exhibit N annexed hereto is Servicios Funerarios' First Set of Interrogatories to AIC.

15. Exhibit O annexed hereto is the AIC's Responses to Servicios Funerarios' First Set of Interrogatories.

16. Exhibit P annexed hereto is the Servicios Funerarios's Second Set of Interrogatories to AIC.

17. Exhibit Q annexed hereto is the AIC's Responses to Servicios Funerarios' Second Set of Interrogatories.

18. Exhibit R annexed hereto is the October 11, 2023 Letter from C. Sires to G. Soledad and D. Ward.

The foregoing is true and correct to the best of my knowledge.

Dated: October 30, 2023

Respectfully submitted,

LESSER, NEWMAN, ALEO & NASSER LLP

BOIES SCHILLER FLEXNER LLP

Michael Aleo

/s/ Carlos M. Sires

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CERTIFICATE OF SERVICE

I, Carlos M. Sires, hereby certify that the above was filed through the ECF system and that I have caused a true and correct copy of the above to be served on Plaintiff's counsel.

Date: October 30, 2023

By: /s/ Carlos M. Sires
Carlos M. Sires